



May 4, 2022

**Via ECF**

Hon. Ronnie Abrams  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2203  
New York, NY 10007

Re: *Best Brands Consumer Products Inc. v. PHSA, LLC*  
Case No. 22-cv-803

Dear Judge Abrams:

In accordance with Your Honor's Individual Rules of Practice in Civil Cases, specifically Rule 1(D), Plaintiff Best Brands Consumer Products, Inc. ("BBCP") is writing to request an adjournment of the Initial Status Conference currently scheduled for May 13, 2022 at 10:00 a.m., and the associated pre-conference joint letter and proposed case management order currently due on May 6, 2022. (Dkt. 6).

Plaintiff filed an Amended Complaint in this matter on April 28, 2022. Defendant Public Health and Safety Advocates, LLC ("PHSA") has yet to answer or otherwise respond to the Amended Complaint. Therefore, we believe it is prudent to adjourn the initial status conference until after PHSA files its answer or response, which is due on May 12, 2022. We, therefore, respectfully request that the Court set a date for the proposed case management plan and the Initial Status Conference that is after the filing of PHSA's response to the Amended Complaint. We also respectfully request that the Conference not be set for June 15<sup>th</sup>-17<sup>th</sup> or June 27<sup>th</sup>-29<sup>th</sup>, since Plaintiff's counsel has an in-person trial on those dates which has been firmly scheduled by another judge of this court.

No previous adjournments or extensions of time have been requested. No other dates have been scheduled yet in this matter and, therefore, none will be affected by this adjournment. In accordance with the Court's Individual Rules, Plaintiff has contacted PHSA's counsel regarding this request on Monday, May 2<sup>nd</sup>. However, as of the writing of this letter, we have not heard back from PHSA's counsel.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Lee A. Goldberg

Lee A. Goldberg

cc: Counsel of PHSA (via ECF and via Email)